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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – NORTHERN DIVISION**

**TESORO REFINING & MARKETING
COMPANY LLC, a Delaware limited liability
company.**

Plaintiff,

V.

ALANDDON LLC, a Nevada limited liability company; KIM FIEGEHEN, as Guardian ad Litem for DONALD A. LEHR, individually; VALARIE M. LEHR, individually; and KIM FIEGEHEN, as Guardian ad Litem, for ALLAN G. FIEGEHEN, individually.

Defendants.

CASE NO.: 3:19-cv-00449-LRH-WGC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO DEFENDANT'S
MOTIONS FOR PROTECTIVE ORDERS
(ECF No. 50 and ECF No. 51)**

THIRD REQUEST

Plaintiff TESORO REFINING & MARKETING COMPANY LLC (“Tesoro”), by and through its attorneys of record, Griffith Hayes, Esq. of the law firm of LITCHFIELD CAVO LLP, and ALANDDON LLC, VALARIE M. LEHR, and KIM FIEGEHEN, as Guardian Ad Litem, for ALLAN G. FIEGEHEN and DONALD A. LEHR (collectively referred to as “Defendants”) by and through their counsel of record, Ryan Russell, Esq. of the law firm of ALLISON MACKENZIE, LTD.,

do hereby stipulate and agree as follows:

1. Plaintiff filed its first amended complaint on November 15, 2019 (ECF No. 17).
2. Defendants filed their answer to the amended complaint on May 29, 2020 (ECF 32).
3. The current deadlines, pursuant to the stipulated discovery plan and scheduling order – third request are: Discovery Cut-Off – April 13, 2021; Amend the pleading or add parties – February 26, 2021; Initial Expert Disclosure: February 14, 2021; Rebuttal Expert Disclosure: March 15, 2021; Dispositive Motion Deadline: May 18, 2021 and Joint Pre-Trial Order: June 29, 2021.

4. On January 19, 2021, Defendants filed their Motion for Protective Order that Allan G. Fiegehen Not Be Deposed (ECF No. 50) and Motion for Protective Order that Donald Lehr Not Be Deposed (ECF No. 51) (the “Motions for Protective Orders”).

5. Pursuant to Stipulation and Order (ECF No. 55), Plaintiff's response to the Defendants' Motions for Protective Orders is March 2, 2021.

6. On March 1, 2021, Defendants' counsel agreed to extend the deadline for Plaintiff to file its response to the Motions for Protective Orders (ECF Nos. 50 and 51) to and including Tuesday, March 16, 2021.

7. Plaintiff took the deposition of Kim Fiegehen, Guardian ad Litem for Allan Fiegehen and Donald Lehr on February 17, 2021. Plaintiff has not received the deposition transcript and believes it is necessary to respond to the Motions for Protective Orders.

8. This is Plaintiff's third request for extension of time to respond to the Motions for Protective Orders (ECF Nos. 50 and 51).

IT IS SO STIPULATED.

Dated: March 2, 2021

LITCHFIELD CAVO LLP

By: /s/ Griffith H. Hayes, Esq.
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1 Dated: March 2, 2021

ALLISON MacKENZIE, LTD.

2 By: /s/ Ryan Russell, Esq.

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6 Attorneys for Defendants

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8 **IT IS SO ORDERED** that the deadline for Plaintiff to file its response to the Motions for
Protective Orders (ECF Nos. 50 and 51) is up to and including Tuesday, March 16, 2021.

10 Date: March 3, 2021.

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12 United States Magistrate Judge

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